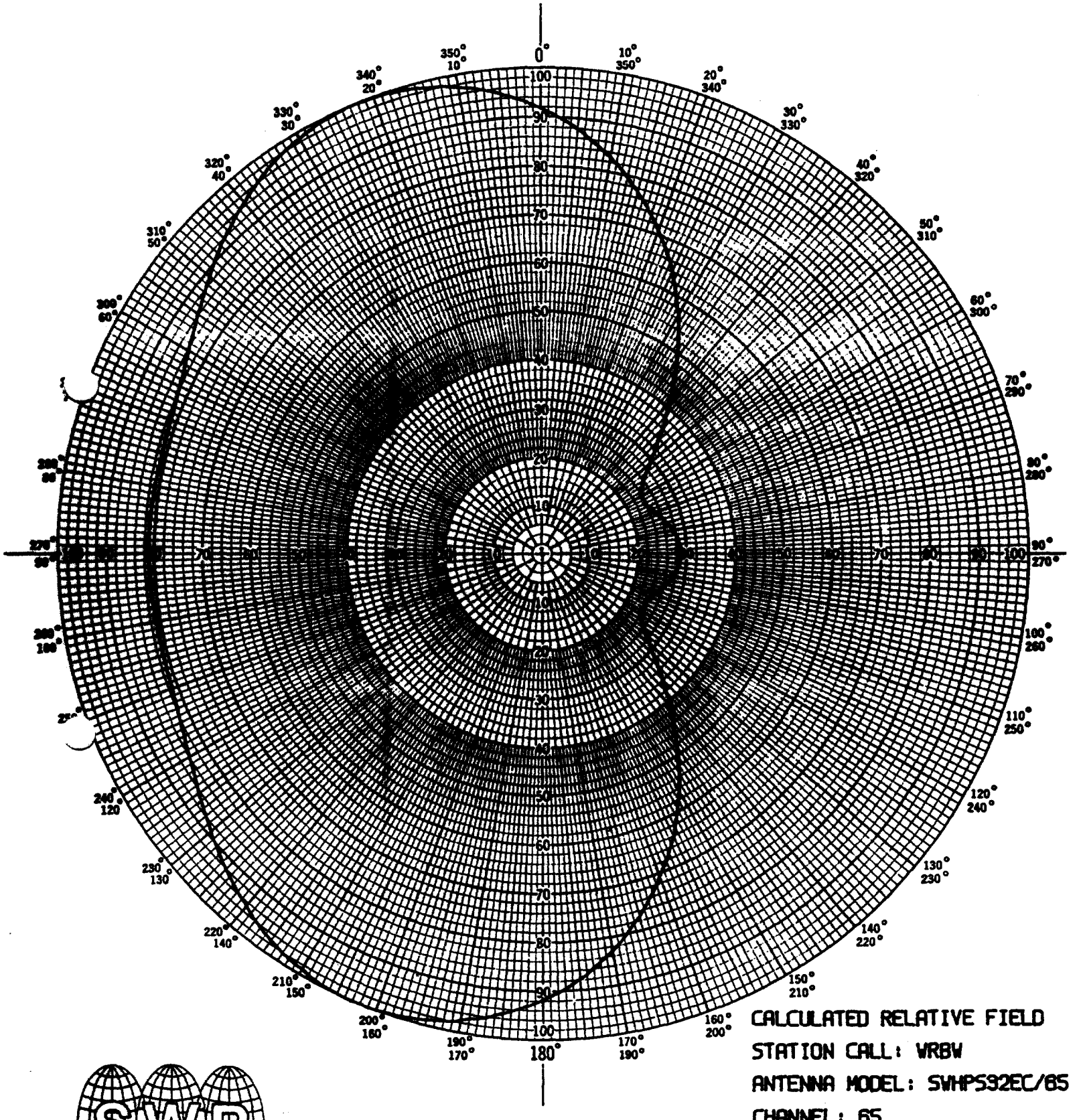
ENGINEERING EXHIBIT
APPLICATION FOR MODIFICATION OF
TELEVISION CONSTRUCTION PERMIT
RAINBOW BROADCASTING, LIMITED
STATION WRBW
ORLANDO, FLORIDA
CH 65 5000 KW (MAX-DA) 465 METERS

Figure 3

Antenna Horizontal Plane Relative Field Radiation Pattern



SWR

Systems With Reliability, INC.

CALCULATED RELATIVE FIELD

STATION CALL: WRBW

ANTENNA MODEL: SWHPS32EC/65

CHANNEL: 65

DIRECTIVITY: 1.83 (2.63 dB)

PATTERN #: 111993-2

DATE: 11/19/93

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Tabulation of Antenna Radiation Data

Azimuth (deg. T)	Horiz. Plane Relative Field[1]	Peak Visual ERP[2] (kW)	(dBk)	Azimuth (deg. T)	Horiz. Plane Relative Field[1]	Peak Visual ERP[2] (kW)	(dBk)
0	0.917	4200	36.23	180	0.917	4200	36.23
10	0.830	3445	35.37	190	0.975	4750	36.77
20	0.710	2520	34.01	200	1.00[4]	5000	36.99
30	0.565	1595	32.03	210	0.987	4870	36.88
40	0.415	861	29.35	220	0.945	4465	36.50
50	0.290	420	26.23	230	0.890	3960	35.98
60	0.240[3]	288	24.59	240	0.840	3530	35.48
70	0.250	313	24.96	250	0.815	3320	35.21
80	0.275	378	25.77	260	0.807[3]	3255	35.13
90	0.287[4]	412	26.15	270	0.813[4]	3305	35.19
100	0.275	378	25.77	280	0.807[3]	3255	35.13
110	0.250	313	24.96	290	0.815	3320	35.21
120	0.240[3]	288	24.59	300	0.840	3530	35.48
130	0.290	420	26.23	310	0.890	3960	35.98
140	0.415	861	29.35	320	0.945	4465	36.50
150	0.565	1596	32.03	330	0.987	4870	36.88
160	0.710	2520	34.01	340	1.00[4]	5000	36.89
170	0.830	3445	35.37	350	0.975	4750	36.77

[1] Based on manufacturer's pattern.

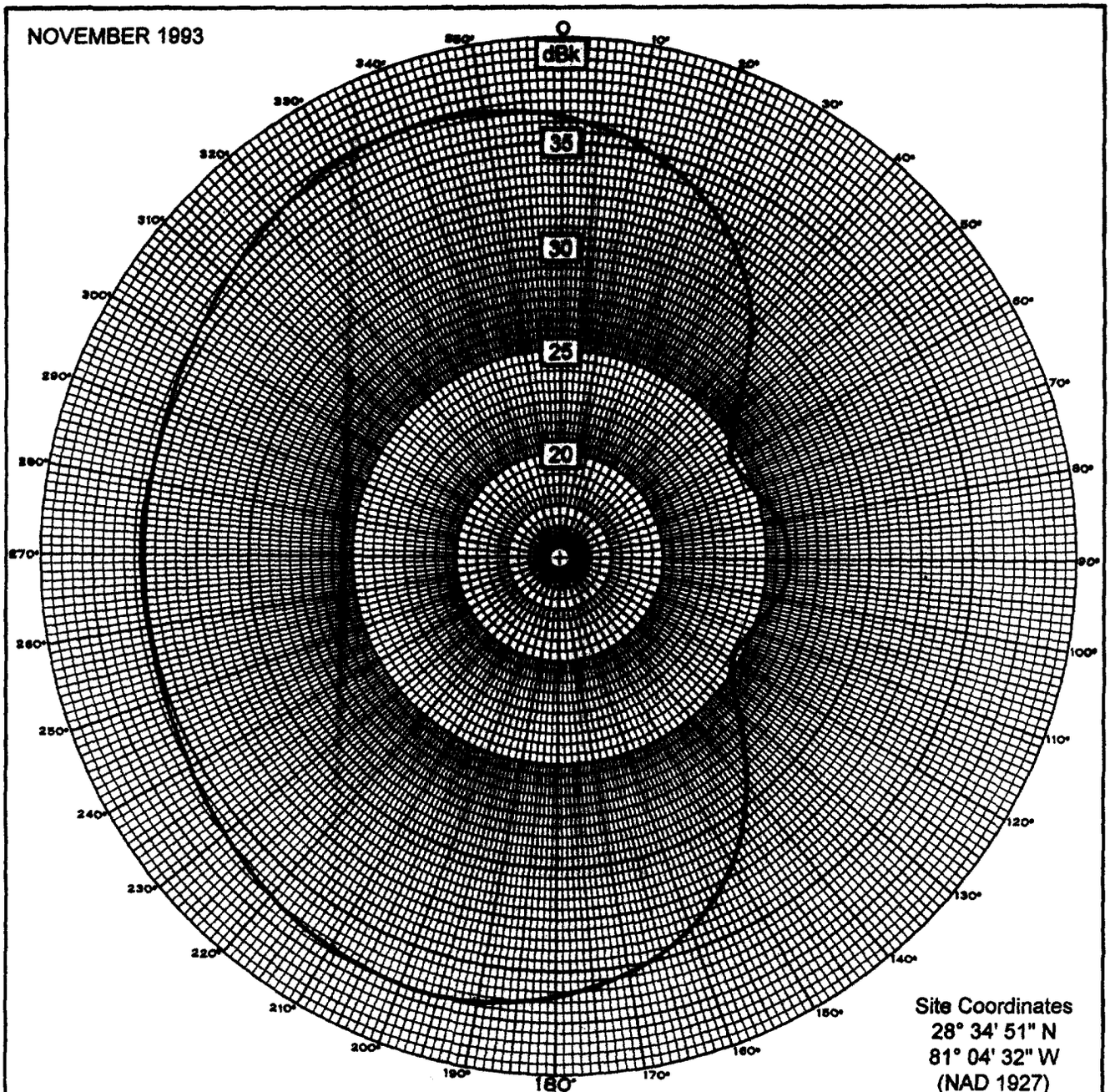
[2] At 1-degree beam tilt angle.

[3] Minimum.

[4] Maximum.

Figure 5

NOVEMBER 1993



Site Coordinates
28° 34' 51" N
81° 04' 32" W
(NAD 1927)

ANTENNA AZIMUTHAL RADIATION PATTERN
(EFFECTIVE RADIATED POWER IN dBk AT 1° BEAM TILT ANGLE)

RAINBOW BROADCASTING, LIMITED
STATION WRBW ORLANDO, FLORIDA
CH 65 5000 KW (MAX-DA) 465 METERS

Jules Cohen & Associates, P.C. Consulting Electronics Engineers

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RAINBOW BROADCASTING, LIMITED
STATION WRBW
ORLANDO, FLORIDA
CH 65 5000 KW (MAX-DA) 465 METERS

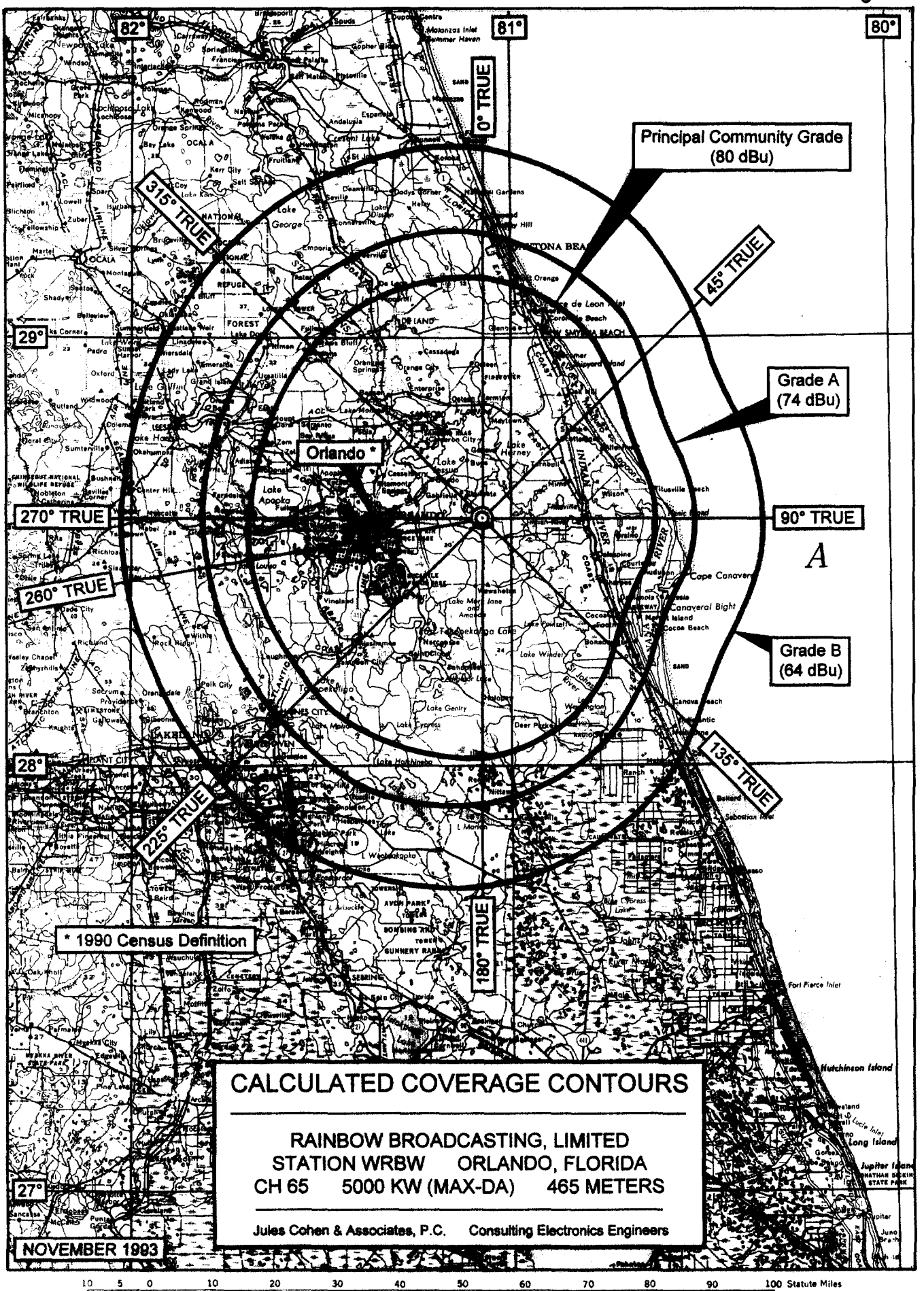
Tabulation of Average Elevations and Distances to the Grade A, Grade B and Principal Community Contours

Azimuth (deg. T)	3.2-16.1 km Terrain Average (m. AMSL)	Antenna Radiation Center Hgt. Above Average Terrain (m)	Depression Angle to the Horizon (deg.)	ERP Employed (dBk)	Distance to Grade A (74 dBu) Contour (km)	Distance to Grade B (64 dBu) Contour (km)	Depression Angle to 80 dBu Contour (deg.)	ERP Employed to 80 dBu Contour (dBk)	Dist. to Principal Community (80 dBu) Contour (km)
0	15	465	0.6	36.2	73.6	95.1	0.6	35.7	62.0
30	16*	459*	0.6	32.0	65.7	85.0	0.7	31.7	55.0
45	17	458	0.6	27.9	58.6	76.6	0.7	27.6	48.1
60	17*	458*	0.6	24.6	53.1	70.3	0.8	24.5	43.1
90	17	458	0.6	26.2	55.7	73.3	0.7	25.9	45.4
120	13*	462*	0.6	24.6	53.3	70.5	0.8	24.5	43.3
135	9	466	0.6	27.9	58.9	77.0	0.7	27.6	48.4
150	5*	470*	0.6	32.0	66.1	85.6	0.7	31.7	55.4
180	2	473	0.6	36.2	74.0	95.7	0.6	35.7	62.3
210	3*	472*	0.6	36.9	75.3	97.5	0.6	36.4	63.4
225	5	470	0.6	36.3	74.0	95.8	0.6	35.8	62.3
240	3*	472*	0.6	35.5	72.6	94.0	0.6	35.0	61.0
260	3*	472*	0.6	35.1	71.8	92.9	0.6	34.6	60.4
270	4	471	0.6	35.2	72.0	93.1	0.6	34.7	60.4
300	7*	468*	0.6	35.5	72.4	93.6	0.6	35.0	60.8
315	7	468	0.6	36.3	73.9	95.6	0.6	35.8	62.1
330	10*	465*	0.6	36.9	75.0	96.9	0.6	36.4	63.1
Average	9	465.5 (rounded to 465)							

* Elevation not included in average.

Figure 6

Figure 7


82°
81°
80°
29°
28°
27°
0° TRUE
45° TRUE
90° TRUE
135° TRUE
180° TRUE
225° TRUE
260° TRUE
270° TRUE
315° TRUE
Principal Community Grade
(80 dBu)
Grade A
(74 dBu)
Grade B
(64 dBu)
A
Orlando *
* 1990 Census Definition
CALCULATED COVERAGE CONTOURS
RAINBOW BROADCASTING, LIMITED
STATION WRBW ORLANDO, FLORIDA
CH 65 5000 KW (MAX-DA) 465 METERS
Jules Cohen & Associates, P.C. Consulting Electronics Engineers
NOVEMBER 1993
10 5 0 10 20 30 40 50 60 70 80 90 100 Statute Miles
10 5 0 10 20 30 40 50 60 70 80 90 100 110 120 130 140 150 Kilometres
10 5 0 10 20 30 40 50 60 70 Nautical Miles

ENGINEERING EXHIBIT
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Demonstration of Compliance with
Guidelines for Human Exposure to Radio-Frequency Radiation

A: Inventory of Stations and Their Facilities

Station/Community of License	Facilities	Antenna Center Above Ground Level (meters)
WJRR(FM)/ Cocoa Beach, FL	Ch. 266C (101.1 MHz), 100 kW(H&V), 487 m	480
WTKS(FM)/ Cocoa Beach, FL	Ch. 281C (104.1 MHz), 100 kW(H&V), 487 m	480
WHTQ(FM)/ Orlando, FL	Ch. 243C (96.5 MHz), 100 kW(H&V), 487 m	480
WKCF(TV)/ Clermont, FL	Ch. 18 (494-500 MHz), 5000 kW(Max-DA), 458 m	447
WRBW(TV)/ Orlando, FL	Ch. 65 (776-782 MHz), 5000 kW(Max-DA), 465 m	455

B: Equivalent Plane Wave Power Density Contributions at a Target 2 Meters Above Ground Level at the Tower Base (ANSI C95.1-1982 Criteria)

Station	Total ERP Aural (kW)	Total ERP Peak Visual (kW)	Power Density at Target (mW/cm^2)	ANSI C95.1-1982 Limit (mW/cm^2)	Fractional Contribution to Limit
WJRR/WTKS	600	--	0.088[1]	1.0	0.088
WHTQ					
WKCF	500	5000	0.001[2]	1.7	0.06
WRBW	500	5000	0.001[2]	2.6	0.04
				Sum of fractional contributions:	0.188

Compliance is achieved since the sum of contributions is less than unity.

C: Equivalent Plane Wave Power Density Contributions at a Target 2 Meters Above Ground Level at the Tower Base (ANSI C95.1-1992 Criteria)

Station	Total ERP Aural (kW)	Total ERP Peak Visual (kW)	Power Density at Target (mW/cm^2)	IEEE/ANSI C95.1-1992 Limit (mW/cm^2)	Fractional Contribution to Limit
WJRR/WTKS	400	--	0.058[1]	0.20	0.29
WHTQ	200	--	0.029[1]	0.23	0.13
WKCF	500	5000	0.001[2]	0.33	0.003
WRBW	500	5000	0.001[2]	0.52	0.002
				Sum of fractional contributions:	0.425

Compliance is achieved since the sum of contributions is less than unity.

[1] Based on use of equation 4 is OST Bulletin 65 and assuming maximum radiation in the downward direction.

[2] Based on use of equation 5 in OST Bulletin 65 and assuming a relative field factor of 0.05 in the downward direction.

JULES COHEN & ASSOCIATES, P.C.
CONSULTING ELECTRONICS ENGINEERS
WASHINGTON, D.C. 20036

ENGINEERING EXHIBIT
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Affidavit

WASHINGTON)
) ss:
DISTRICT OF COLUMBIA)

Bernard R. Segal, being first duly sworn, says that he is a consultant to the firm of Jules Cohen & Associates, P.C., consulting electronics engineers with offices in Washington, DC; that he is a professional engineer registered in the District of Columbia; that his qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission; that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to be on information and belief and, as to those statements, he verily believes them to be true and correct.

Bernard R. Segal, P.E.

Subscribed and sworn to before me this 30th day of November, 1993.

Erlinda L. Carpenter
Notary Public, District of Columbia
My commission expires August 31, 1997

SECTION VII – CERTIFICATION (Page 2)

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant	Signature
RAINBOW BROADCASTING, LTD.	Joseph Rey
Date	Title
DECEMBER 6, 1993	Joseph Rey, President Rainbow Broadcasting company, Inc. General Partner

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, processing of the application may be delayed or the application may be returned without action pursuant to the Commission's rules. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 72 hours to 302 hours 45 minutes with an average of 192 hours 31 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Information Resources Branch, Room 416, Paperwork Reduction Project, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0027), Washington, D.C. 20503.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

ORIGINAL

RECEIVED

DEC 2 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of	)	
	)	
RAINBOW BROADCASTING COMPANY	)	File Nos. BMPCT-910625KP
	)	BTCCT-911129KT
For Extension of Construction	)	
Permit and For Consent to	)	
Assignment of Station WRBW(TV)	)	
Orlando, Florida	)	

To: The Commission

RAINBOW OPPOSITION TO PRESS
EMERGENCY PETITION FOR EXTRAORDINARY RELIEF

Rainbow Broadcasting Company, permittee of UHF television Station WRBW, Channel 65, Orlando, Florida, hereby opposes the 10 December 1993 "Emergency Petition for Extraordinary Relief to Require Compliance With Administrative Procedure Act and the Commission's Ex Parte Rules," filed by Press Broadcasting Company, licensee of Station WKCF(TV), Channel 18, Clermont, Florida. The filing is an effort by fiat of a regulated entity to force upon the Commission a schedule for action which the Act does not require, the Commission's rules do not specify and the Court has here already specifically declined to impose, *In re Press Broadcasting Company,* No. 93-1684, filed December 8, 1993.

The gravamen of Press' pleading is that unless the Commission acts by a date arbitrarily assigned by Press

(a date, moreover, which does not permit response by Rainbow on the time schedule allowed for in the Commission's Rules), to provide certain assurances of its bona fides specified by Press, Press will assume that the agency is engaged in an ongoing impropriety which Press threatens to bring to the attention of the same Court of Appeals which has already declined either to assume any agency impropriety or to mandate any Commission action. Press' pleading is facially absurd and should be dismissed.

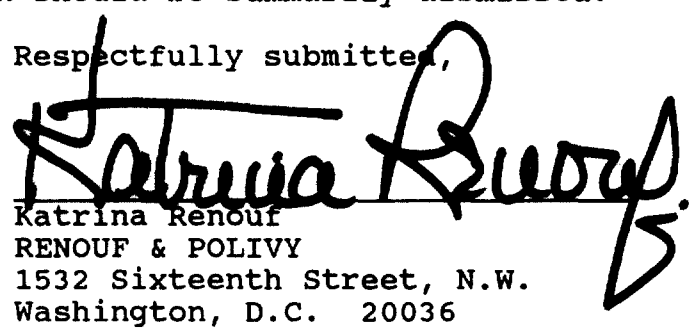
In the first place, the pleading claims to be necessitated by Press' reading of the underlying meaning of the Court of Appeals' three sentence *per curiam* order denying Press' petition for mandamus, *In re Press Broadcasting Company*, No. 93-1684, released December 8, 1993. However, Press' opinion of the meaning of the *per curiam* order, derived from its recitation of what was in the mind of the judge who wrote one of the opinions cited in that *Order*, is without legal significance. The opinion of the Court of Appeals speaks for itself, as do the cases it elected to cite. And what the Court held is that the interests asserted by Press are appropriately left to the administrative process because Press "has not demonstrated that it lacks an ordinary, adequate legal

remedy, and thus is not entitled to extraordinary relief" from the Court. No more, then, is it entitled to such relief from the Commission.

In the second place, Press' pleading purports to instruct the Commission on how to arrange its schedule, an entitlement unavailable to any other petitioner appearing before the Commission. Nothing is more surely left to the Commission's discretion than how best to conduct its proceedings. As the Supreme Court held in *F.C.C. v. Schreiber*, 381 U.S. 279, 289 (1965), Section 4(j) of the Act, 47 U.S.C. § 154(j), "empowers the Federal Communications Commission to 'conduct its proceedings as will best conduce to the proper dispatch of business and to the ends of justice.' This Court has interpreted that provision [in *F.C.C. v. Pottsville Broadcasting Co.*, 309 U.S. 134, 138 (1940)] as 'explicitly and by implication' delegating to the Commission power to resolve 'subordinate questions of procedure.'" More specifically: "Congress has 'left largely to [the Commission's] judgment the determination of the manner of conducting its business which would most fairly and reasonably accommodate' the proper dispatch of its business and the ends of justice." *Id.* (quoting from *F.C.C. v. WJR*, 337 U.S. 265, 282 (1949).

Finally, no reason has ever appeared and none is recited now why action in the normal course would not suffice to protect any legitimate interest Press has asserted in its various pending pleadings. The inference is by now inescapable that Press' essential interest is in subverting the Commission's processes to its own private anticompetitive ends in order to prevent inauguration of a competing television service in Orlando. Avoidance of competition is not an interest which merits protection under the Act or the Commission's rules; most certainly it is not an interest which merits extraordinary relief. Press' Emergency Petition should be summarily dismissed.

Respectfully submitted,



Katrina Renouf
RENOUF & POLIVY
1532 Sixteenth Street, N.W.
Washington, D.C. 20036
202.265.1807

Counsel for Rainbow
Broadcasting Company

21 December 1993

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Rainbow Opposition to Press Emergency Petition for Extraordinary Relief to Require Compliance with Administrative Procedure Act and the Commission's Ex Parte Rules were sent first class mail, postage prepaid, this twenty first day of December 1993, to the following:

Roy J. Stewart,
Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 314
Washington, D.C. 20554

Barbara A. Kreisman, Chief
Video Services Division, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 702
Washington, D.C. 20554

Clay Pendarvis, Chief
Television Branch, Video Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 700
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Katrina Renouf